REMARKS

The purpose of this supplemental Reply is to add some additional remarks regarding the general nature of Garvey et al., Carcerano et al., and the disclosure of the present application.

Claims 1-33 are pending. Claims 10-12 were amended and claims 14-33 were added in the response filed June 8, 2004. No claims are cancelled, and no additional amendments are made in this supplemental reply.

GARVEY ET AL.

Garvey et al. disclose displaying or configuring multiple devices configuration information on a single UI screen. The issues with which Garvey et al. are concerned include how to display identical values of multiple entities in one manner and different values in another. In contrast, the present specification discloses using the same form (e.g., URL) for both "Get" and "Set" operations, regardless of the contents (of a single device or multiple devices). The independent claims 1, 10, 12, 13, and 16 recite using the same for two methods. Additionally, claims 4, 18, and 27 recite set operations, and claims 3, 5, 6, 11, 19, 20, 26, 28, and 29 recite get routines or methods. Using an embodiment disclosed in the present specification, a single script can be created and used for both displaying and updating configuration information (see claims 8, 9, 22, 23, 31, and 32, for example). Some benefits may include a 50% reduction in the number of files necessary and the ability to show error messages and validation information on the same page with which the user interacts. The systems disclosed in the present application are for different purposes than, and are not related to, Garvey et al.

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CARCERANO ET AL.

Carcerano et al.'s claim 16, states that one URL request is used for retrieving data, and a second URL for setting the data. An embodiment of the present application uses a single form (e.g., URL) for both getting and setting data. In contrast, the independent claims 1, 10, 12, 13, and 16 recite using the same form for two methods, while claims 4, 18, and 27 recite set operations, and claims 3, 5, 6, 11, 19, 20, 26, 28, and 29 recite get routines or methods. An embodiment of the present application relies on using HTML hidden variables (see claims 2, 17 and 25), which are never mentioned in Carcerano et al. Using a single method or URL for two methods facilitates having one script file for both the get and the set operations. Having one script file for both get and set operations reduces the number of files of an application by half, allows for easier maintenance, and improves the usability by showing validation and error messages on the same screen that user is interacting with. Carcerano et al. never address the issue of how to display validation and/or error messages, which is a novelty of an implementation of an embodiment disclosed in the present application.

In Carcerano et al., the first URL request identifies a targeted one of the network devices. In an embodiment of the present application, the URL only contains the web server's address, the targeted device information is never visible in the present application's form or URL. An embodiment of the present application identifies targeted network devices by assigning a hidden variable with a device ID, and have the device ID posted to the form that user is interacting with.

Carcerano et al. require constant polling of device information to keep in sync with their database. In contrast, in an implementation of the present application obtaining

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device information is event driven. The present application requires less polling of the targeted device, thus reducing the impact to targeted device and network traffic.

Carcerano et al. require a database to hold device information. In an implementation of the present specification, an object model in memory is used for holding information. Carcerano et al., first accumulate changes in their database, and then update their device. In the present application, once the object model is modified, the object model may immediately update the device by generating the required commands and sending the required commands to the device. A different communication mechanism is involved in an implementation of the present application than in Carcerano et al. An implementation of the present application may use the synchronizing of device values as in telnet protocol, and Carcerano et al. use SNMP.

For the Examiner's convenience the arguments presented in the prior response are repeated below.

I. REJECTION BASED ON 35 USC §103

The Office Action rejects claims 1-13 under 35 USC §103 as unpatentable over Carcerano et al. in view of Garvey et al. This is incorrect. Fundamentally, the method and apparatus resulting from modifying Carceraon et al. in view of Garvey et al. lack a disclosure, teaching, or suggestion of associating two functionally different submit methods with one form and selectively executing one of the methods when a submit button is selected at a client, wherein both submit method are for altering the same state.

A. INDEPENDENT CLAIMS 1, 10, 12, AND 13

The Office Action (at page 3) stated,

As result of the system the web browser interface is displayed as shown in Fig. 7 which includes device status (element 125) (a state of a particular network device) and device features (element 127)(changing the state of the particular network device)(associating with the form one of a first submit method for obtaining information about a state of a particular network device, and a second submit method for changing the state of the particular network device; sending the page to the client process;). ....

In other words, the Office Action associates the web page portion "Device Status" (125) with the claimed "first submit method for obtaining information about a state" and the web page portion "Device Features" (127) with the claimed "second submit method for changing the state". The description of FIG. 7 is at column 12, line 63, through column 13, line 30, which state,

FIG. 7 is a representational view of browser interface 121 displaying detailed information about a particular device on network 1. In the example shown in FIG. 7, a printer has been selected. In response to a URL-encoded request to HTTP server 103, browser 83 has received HTML code identifying device status information 125, device and service information 126, device features 127 and hardware information 128. Accordingly, browser 83 has generated a visual display on browser interface 121 as instructed by this HTML code.

If the user of browser 83 has administrator privileges, as indicated by administrator mode indicator 122, then browser interface 121 [and not necessarily the web page of FIG. 7] can be manipulated to change the status and configuration of the device. For example, the user could change device features 127 so as to enable or disable stapling or sorting. In response to such changes, browser 83 sends an appropriate URL-encoded request identifying the targeted printer and the updated configuration data. As discussed above, HTTP server 103 runs the CGI script (or ASP web page) identified by the URL in the request so as to update database 105 accordingly. Then, network management server 104 modifies the status or configuration of the device according to the updated database.

Other possible pages that can be displayed by browser 83 through browser interface 121 include a preferences page, a support page and an EEPROM flash page. The preferences pages allows a user to monitor and change preferences data for browser 83 and browser- based network management system 109. The support page provides contact information for support of managed devices. Finally, the flash EEPROM page allows a user to flash (update) the EEPROM in a network interface device such as EEPROM 56 shown in FIG. 2. Thus, browser-based

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network management system 109 can be used to not only configure these network interfaces, but also to update the software that runs those devices.

Although FIG. 7 shows two portions on one GUI, one portion is used for viewing features and the other section is used for viewing the status. There is no disclosure in FIG. 7 or in its description cited above of what method is used for obtaining information about a state and what method is used for changing the state. The word "method" only appears as the second word of the preamble of the claims of Carcerano et al. and nowhere else in their disclosure. Otherwise, the words "method", "routine", "subroutine", and "function", for example, do not appear in the specification of Carcerano et al. Inferring which operations are performed by which methods or other types of programming units is impossible. Presumably, the same method is used for performing all the functions associated with the web page of FIG. 7. In fact, FIG. 9 includes a "VIEW STATUS/CONFIGURATION OF A DEVICE" (see box S902) in the same flow diagram as "CHANGE STATUS/CONFIGURATION OF DEVICE" (see box S907), thereby suggesting that both getting information about a device and changing the status or state of a device are performed by the same method.

Further, claims 1, 10, 12, and 13 recite,

> associating with the form one of a first submit method for obtaining information about *a state* of a particular network device, and a second submit method for changing *the state* of the particular network device... (emphasis added).

For antecedents, the "state" which is changed relies on the "state" about which information is changed, and therefore both states are the same "state". In contrast, the Office Action relies upon the alleged states associated with the web page portion "Device Status" (125) (which the Office Action implies has "states" such as "printing" or "out of paper") for the state about which information is being obtained and the web page portion

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"Device Features" (127) (which the Office Action implies has "states" such as "12 pages per minute" or "72 MB maximum memory") for the states that are being changed, which are different types of states (assuming that they are "states"). If web portion "Device Features" (127) is the state being changed of claims 1, 10, 12 and 13, then to meet claims 1, 10, 12 and 13, (1) the web portion "Device Features" (127) also needs to be a state about which information is obtained and (2) a different method must be used for obtaining information about and for changing the alleged states of the web portion "Device Features" (127). Similarly, if web page portion "Device Status" (125) is the state being changed of claims 1, 10, 12, and 13, then to meet claims 1, 10, 12, and 13, (1) the web page portion "Device Status" also needs to be a state about which information is obtained and (2) a different method must be used for obtaining information about and for changing the alleged state of the web page portion "Device Status" (127). However, the Office Action has not shown either of these to be true.

Additionally, Carcerano et al. do not discuss any "form" associated with the web page displayed in FIG. 7, while in contrast claims 1, 10, 12, and 13 recite a "form" being associated with the two submit methods. Assuming arguendo that there is such a "form", Carcerano et al. do not discuss using the web page for changing the alleged states displayed on the web page (associated with the web page portion "Device Features" (127)). Instead, Carcerano et al. (at column 13, lines 5-8) state,

> If the user of browser 83 has administrator privileges, as indicated by administrator mode indicator 122, then browser interface 121 [and not necessarily the web page of FIG. 7] can be manipulated to change the status and configuration of the device. For example, the user could change device features 127 so as to enable or disable stapling or sorting.

In other words, although the browser interface 121 is used for making changes to the status or configuration, the web page shown in FIG. 7 (of the browser interface 121) is

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not identical to the web page of FIG. 7, and therefore the web page of FIG. 7 is not

disclosed as being used for changing the device features 127. As stated in column 13,

lines 18 and 19, "Other possible pages that can be displayed by browser 83 through

browser interface 121". Similarly, FIG. 6 shows another web page included in browser

interface 121. Thus, the web page of FIG. 7 is just one of multiple pages of browser

interface 121, and is not disclosed as being used for changing the configuration of the

device features.

The web page of FIG. 7 is a properties page, as indicated by the legend

"Properties for 173_PLC 123" (just above the bar having the legend "Device Status").

One of ordinary skill in the art would presumably use a properties page for viewing and

not for changing the properties, suggesting that the properties web page displaying the

web page portion "Device Features" (127) is not used for changing the alleged "states"

associated with web page portion "Device Features" (127).

Additionally, there are no edit buttons next to the fields of the web page portions

"Device Status" (125) or "Device Features" (127). Instead, the edit buttons appear next

to the fields of the web page portions "Device Services and Information" and the "Media

Status". Even if the edit buttons facilitate the changing of an alleged state, presumably

after pressing the edit button, another web page or dialog box associated with another

form (if any) having different input fields would be displayed (which accepts input for

effecting the change of a configuration) instead of the web page shown in FIG. 7.

Thus, in view of the above, there is no disclosure in FIG.7 or in the above

description of FIG. 7 of associating the web page of FIG. 7 with both obtaining

information and with changing information. Consequently, there is also no disclosure of

associating the page of FIG. 7 with both a first submit method for obtaining information

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and a second submit method for changing information about the same state of the same

network device, in contrast to the "form" of claims 1, 10, 12 and 13.

B. CLAIM 2

The Office Action (at page 2) stated,

> By teaching the use of ASP as indicated above, the reference teaches that ASP
> provides means for managing the display page state by placing values in hidden
> form elements where the form elements travel with the form page.

However, the Office Action does not support its contention that inherently by using ASP,

values identifying the particular network device are hidden in the form sent from the

apparatus for configuring the particular network device to the client. The burden of proof

is upon the U.S. Patent and Trademark Office, when alleging that a feature is inherent,

and the Applicants respectfully request support for the assertion of inherency.

C. CLAIMS 4-6

In claims 4-6, "the plurality of input fields" of the first and second submit

methods both have the same antecedents, and therefore refer to the same plurality of

input fields. Consequently, in claims 4-6, both the first and second submit methods

obtain information for filling "the plurality of input fields". Thus, both the first and

second submit methods obtain information for the same plurality of input fields. Neither

Carcerano et al. or Garvey et al. (whether taken alone or in combination) disclose, teach

or suggest using two different methods for obtaining the same information and for filling

in the same plurality of input fields.

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D. CLAIM 7

The Office Action has not shown that the "first environmental variable" is a "Request.QueryString" and the "second environmental variable" is "Request.Form".

E. DEPENDENT CLAIMS 2-9 AND 11

Each of claims 2-9 and 11 depends upon one or more of independent claims 1, 10, 12, and 13 and is therefore allowable for at least the same reasons. Although each of claims 1-13 contain additional features that are separately patentable, in view of the patentability of independent claims, the remaining dependent claims are not argued at this time to expedite prosecution.

F. NEW CLAIMS

Claim 14 recites a network using the apparatus of claim 12 and is therefore patentable for at least the same reasons as claim 12.

Claim 15 recites that the second submit method obtains information (in addition to changing information). Thus, in claim 15 both the first submit method and the second submit method obtain information method, which is not disclosed by Carcerano et al. or obvious over the combination of Carcerano et al. in view of Garvey et al.

Claim 16 includes all of the limitations of claim 1 and is therefore allowable for at least the same reasons. However, claim 16 is written from the point of view of the client, whereas claim 1 is written from the point of view of the apparatus configuring the network device. Claim 16 additionally, recites that which method is used to obtain the information in the plurality of input fields is based on user input, which is not shown in Carcerano et al.

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New claims 17-25 are computer readable medium claims corresponding to

method claims 2-9, and new claims 26-33 are apparatus claims corresponding to method

claims 2-9. Therefore, claims 17-33 are patentable for at least the same reasons as claims

2-9.

II. CONCLUSION

For the reasons set forth above, all pending claims are patentable over the art of

record. Accordingly, allowance of all claims is hereby respectfully solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if

it is believed that such contact would further the examination of the present application.

No extension fee is believed to be due. However, to the extent necessary,

Applicants petition for an extension of time under 37 C.F.R. § 1.136. The Commissioner

is authorized to charge any fee that may be due in relation to this application to our

Deposit Account No. 50-1302.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP

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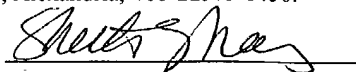David Lewis
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